

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: FAIRFIELD SENTRY LIMITED, et al., Debtor in Foreign Proceedings.	Chapter 15 Case Case No. 10-13164 (CGM) Jointly Administered
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. THEODOOR GGC AMSTERDAM, et al., Defendants.	Adv. Pro. No. 10-03496 (CGM) Administratively Consolidated
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. BNP PARIBAS SECURITIES SERVICES LUXEMBOURG, et al., Defendants.	Adv. Pro. No. 10-03627 (CGM)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all prior pleadings and proceedings herein, Defendant Altipro Master Fund (sued as “Altigefi-Altipro Master a/k/a Olympia Capital Management,” and hereinafter referred to as “Defendant” or “Altipro”), a French Fonds Commun de Placement, represented by its portfolio management company, Olympia Capital Management SA, will move this Court, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of

Bankruptcy Procedure, for an order dismissing with prejudice the Fifth Amended Complaint filed on August 11, 2021 by the Liquidators of Fairfield Sentry Limited and Fairfield Sigma Limited in Adv. Pro. No. 10-03627 (ECF No. 143).

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: October 29, 2021

Respectfully Submitted,

WINSTON & STRAWN LLP

By: /s/ Keith R. Palfin

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